<u>REMARKS</u>

Applicants respectfully request consideration of the subject application. This Response is submitted in response to the Office Action mailed July 13, 2005. Claims 1-30 stand rejected. In this Amendment, claims 1 and 15 have been amended. No new matter has been added.

<u>Claim rejections under 35 U.S.C. § 102(b) and 103</u>

The Examiner has rejected claims 21-27 under 35 U.S.C. § 102(b) as being anticipated by Uppaluru (U.S. Patent No. 5,915,001, hereinafter "Uppaluru"). The Examiner has rejected claims 1-11 and 15-20 under 35 U.S.C. § 103(a) as being unpatentable over Bennett in view of Uppaluru. The Examiner has also rejected claims 12-14 under 35 U.S.C. § 103 (a) as being unpatentable over Bennett in view of Uppaluru and further in view of Denneberg et al. (U.S. Patent No. 6,724,864).

Applicant respectfully submits Uppaluru fails to teach or suggest, *inter alia*, as required by claim 21: "providing a voice user interface that enables the user to navigate and query data from a plurality of domains <u>using spoken navigation and natural language query commands</u>, wherein each domain comprises data corresponding to a respective type of object in the enterprise data system." Similar limitations are included in independent claims 1 and 15.

Uppaluru is directed to an accessible voice web. Upalluru discusses a personal voice web system in which the subscriber navigates among pages in the personal voice web using speech. Under the "Query localization and customization" heading in Col. 18 and continuing to Col. 19, Uppaluru discloses:

> As the subscriber navigates from service page to service page in the personal web 300, the system is able to access the corresponding voice web attributes and preferences page using its embedded URL...

From the home page 301, the subscriber accesses the targeted voice
web service page by navigating the appropriate hyper links from
the voice web home page 301. In response, the selected service is
invoked 803 and the selected service then proceeds to deliver 804
the service. During invocation 803 of the selected service, both the
service page and the attributes and preferences page associated
with the service page are extracted by the service agent.

During delivery 804 of the selected service, the service agent uses
the attributes and preferences page associated with the selected
service to customize queries of the associated service database.
More specifically, using the attributes and preferences information,
the service agent automatically fills in the needed fields in the
corresponding query form with user specified defaults and
preferences. Having filled the appropriate fields, the service agent
plays the remaining query form to the subscriber thereby greatly
reducing the information that the subscriber has to supply on the
telephone. The service agent then obtains the remaining
information, if any, from the subscriber and submits the query form
to the service database...

Thus, Uppaluru only discloses using spoken navigation to navigate among the service

forms and pages. At col. 2, lines 29-32, Uppaluru further discloses that "these web pages are

linked using HTML hyper-links that are accessible to users via voice commands and touch-tone

inputs." Uppaluru also indicates at col. 3, lines 18-20 that "Once authenticated, the user is

allowed to navigate and access more information from the voice web using voice commands." In

addition, Uppaluru discloses at col. 3, lines 46-48, ".... enhances his/her navigation and access of

the information stored in the voice web using voice commands and input." Uppaluru further

discloses that "Voice web browser 106 provides... convenient voice activated navigation and

access to voice web pages 103." See col. 6, lines 44-46. At col. 12, lines 16-19, Uppaluru

describes "After receiving the prompted information, calendar and appointments service agent

generates the appropriate query to extract the requested calendar information from a calendar

service database."

At no point does Uppaluru teach or suggest locating data on the voice web site using a

natural language query in addition to navigating from page to page within the accessible voice web system. Instead, Uppaluru is limited to voice navigation of a web, which does not offer in addition to voice navigation, a system for searching for information located in the web without using voice navigation.

Uppaluru is therefore limited to a mechanism for accessing data that is very static. An individual may only access their own account data through a predetermined fixed navigation path. Uppaluru does not allow users to perform ad-hoc queries, thereby allowing the users to access a wide variety of different data types from a telephone.

In contrast, the present invention comprises a system and method that enables various users to access data stored in a database via a telephone link using voice commands, wherein the access includes support for user-generated ad hoc queries and allows users access to a variety of data that has been previously stored by the users or others in the database. In general, the user input will either comprise a command, such as "Look up X," or a response to a system prompt, such as "Yes," or a value in a selection list presented to the user.

Bennett is directed to a speech recognition system which is used to search for a spoken answer to a user's spoken query, which is in the form of question. The spoken question is converted into text. The text is then sent to a natural language engine and database processor where the engine narrows the search to a single stored question. The answer corresponding to the single stored question is returned to the user. See the Abstract and col. 25, lines 19-35.

Bennett does not teach or suggest enabling the user to navigate the enterprise data system and enabling the user to request an ad hoc query. In addition, Bennett does not teach or suggest converting the spoken natural language query into a data query and executing the data query to retrieve any data in the enterprise data system corresponding to the ad hoc query. Instead, Bennett retrieves a data query from a database, and then provides the user with an answer to the

data query retrieved from the database.

In contrast, the presently claimed invention allows users to search for data using either spoken navigation, natural language query commands, or a combination of spoken navigation and natural language query commands.

Moreover, there is no motivation to combine the above-cited references. As discussed above, Bennett is directed to a speech recognition system. In contrast, Uppaluru is directed to a system and method for providing and using an accessible voice web. Bennett teaches away from enabling a user to request an ad hoc query and enabling the user to navigate in the enterprise data system using spoken navigation. Bennett describes that "while it is often possible to browse and search on one's own to locate items of interest, it is usually easier and more efficient to get some form of human assistance first, and, with few exceptions, this request for assistance is presented in the form of an oral query." Thus, Bennett teaches away from providing an enterprise data system in which users are enabled to search for data using either spoken navigation, natural language query commands, or a combination of spoken navigation and natural language query commands.

Thus, applicants respectfully submit that independent claims 1, 15 and 21 are patentable over the cited art. As claims 2-14, 16-20 and 22-27 depend from independent claims 1, 15 and 21, respectively, dependent claims 2-14, 16-20 and 22-27 are also patentable over the cited art.

<u>Claim rejection under 35 U.S.C. § 102(e)</u>

The Examiner has rejected claims 28-29 under 35 U.S.C. § 102(e) as being anticipated by Bennett et al. (U.S. Patent No. 6,633,846, hereinafter "Bennett").

Applicant respectfully submits that Bennett, fails to teach or suggest, *inter alia*, as required by claim 28: "storing the <u>pre-compiled data</u> in a local database <u>that is apart from</u> the

enterprise data system."

Bennett is directed to a speech recognition system which is used to search for a spoken answer to a user's spoken query. Bennett only discloses a single database 188, as shown in Figure 1, located at the server. Thus, Bennett does not teach or suggest a local database that is apart from the enterprise data system.

In addition, Bennett does not teach storing pre-compiled data in a local database. As illustrated in Figure 11C, the answer is compressed after the answer is extracted from a file and then sent to the client. There is no indication that any data is stored in a local database.

The Examiner points to Col. 25, lines 19-35 as teaching the above limitations. Applicants respectfully disagree. Bennett discloses that the questions are stored in a database, but does not teach that any data is pre-compiled nor does Bennett teach a database, in which the data is stored, that is apart from the enterprise data system.

In contrast, the presently claimed invention requires the local database to be apart from the enterprise data system, and also requires storing pre-compiled data in a local database.

Thus, applicants respectfully submit that independent claim 28 is patentable over the cited art. As claims 29-30 depend from independent claim 28, dependent claims 29-30 are also patentable over the cited art.

Deposit Account Authorization

Authorization is hereby given to charge our Deposit Account No. 02-2666 for any charges that may be due. Furthermore, if an extension is required, then Applicant hereby requests such extension.

If the Examiner determines the prompt allowance of these claims could be facilitated by a telephone conference, the Examiner is invited to contact Marina Portnova at (408) 720-8300.

Respectfully submitted,

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